REMARKS

Claims 1-22 were examined and rejected, Applicants amend claim 13. Applicants contend that no new matter is added herein as the amendment is supported, at least by claim 1 as filed. Applicants respectfully request reconsideration of claims 1-22, as amended, in view of at least the following remarks.

I. Claims Rejected Under 35 U.S.C. § 102

The Patent Office rejects claims 1, 2, 5, and 10-15 under 35 U.S.C. § 102(b) as being anticipated by 5,427,535 to Sinclair (Sinclair). It is axiomatic that to be anticipated, every limitation of a claim must be disclosed within a single reference.

Applicants respectfully disagree with the rejection above and submit that independent claim 1 is allowable for at least the reason that <u>Sinclair</u> does not describe or teach pressure contacts formed in the interposer, wherein the pressure contacts and the contact surface are directionally deformable, as required by claim 1. According to claim 1, pressure contacts which are formed in the interposer and include some of the structure of the interposer, and contact surfaces are both deformable.

Sinclair describes base 26 having apertures 32 drilled therethrough or molded therein to extend entirely from top face 28 to bottom face 30 (see col. 5, lines 57-60). Resilient, electrically-conductive terminal assemblies 38 are mounted in apertures 32, where each of assembly 38 includes a terminal 40 insert molded into a generally cylindrical elastomeric plug 42 (see col. 6, lines 3-7). Moreover, terminal 40 include dimples 50 and 52 on contacts 46 and 48, where contacts 46 and 48 define pressure-bearing surfaces that will compress an adjacent elastomer of plug 42 (see col. 6, lines 26-40).

However, the Patent Office has not identified and Applicants are unable to find any description or teaching in <u>Sinclair</u> that accounts for pressure contacts formed in the interposer, wherein the pressure contacts and contact surfaces are directionally deformable, as required by claim 1. Specifically, there is no description or teaching of contacts 46 and 48 being directionally deformable. Instead, only terminal assemblies 38 mounted in apertures 32 of base 26 are described as deformable. Moreover, dimples 50 and 52 are not described or taught as

directionally deformable. For instance, at Col. 6, Lines 26-36 and Figures 10 and 12-13, resiliently deflectable genuinely sinusoidal bends 54 bend while contacts 46 and 48 remain substantially parallel so that sides of the contacts opposite the dimples define pressure bearing surfaces that would compress the adjacent elastomeric plug 42 (e.g., elastomeric plug 42 between contacts 46 and 48) to reduce the height of terminal 40. Thus, there is no deformation of any of the dimples or surfaces, but only a resilient deflectable bending of bends 54 and a compression of elastomeric plug 42 (see Col. 6, Lines 57-Col. 7, Lines 31). Hence, for at least the reasons cited above, Applicants respectfully request that the Patent Office withdraw the rejection above to claim 1.

Applicants submit that dependent claims 2, 5 and 10-12 being dependent upon allowable base claim 1, are patentable over the cited references for at least the reasons cited above. Thus, Applicants respectfully request the Patent Office withdraw the rejection of dependent claims 2, 5 and 10-12 as being unpatentable.

In addition to the reasons given above with respect to dependent claim 5, Applicants respectfully disagree with the rejection above and submit that dependent claim 5 is allowable for the reason that Sinclair does not describe flexible three dimensional domes formed in the generally planar interposer, as required by claim 5. Specifically, in addition to the argument provided above with respect to claim 1, the Patent Office has not identified and Applicants are unable to find any teaching or suggestion in Sinclair of domes formed in the generally planar interposer. Instead, Sinclair describes apertures 32 drilled therethrough. Hence, for at least this additional reason, Applicants respectfully request the Patent Office withdraw the rejection above of dependent claim 5.

The Patent Office rejects claims 13-15 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 5,738,531 to Beaman et al. (Beaman).

Applicants respectfully disagree with the rejection above and submit that independent claim 13, as amended, is allowable for at least the reason that <u>Beaman</u> does not describe or teach a plurality of pressure contacts each having <u>a directionally deformable contact surface</u> on the second side of the planar-shaped base to form removable electrical pressure connections to connector pads of an electronic device, as required by amended claim 13.

Beaman teaches interposer 3 having conductive inter-layer 16 to allow further inter-connection while the soldered deposits aligned at 17 remain electrically disconnected (see Figure 4 and Col. 4, Lines 21-31). However, the Patent Office has not identified and the Applicants are unable to find any teaching or suggestion in Beaman of a pressure contact having a directionally deformable contact surface, as required by claims 13. Hence, for at least this first reason, Applicants respectfully request the Patent Office withdraw the rejection above of claim 13.

Applicants assert that dependent claims 14-15, being dependent upon allowable base claim 13, are allowable to at least the reasons explained above. Hence, Applicants respectfully request the Patent Office withdraw the rejection above of dependent claims 14-15.

In addition to the reasons above, Applicants respectfully disagree with the rejection above and submit that dependent claim 16, is allowable for at least the reason that <u>Sinclair</u> does not describe pressure contacts on the second side of the planar shape, wherein the pressure contacts include domes having an elasticity and thickness sufficient to flex without permanently deforming or damaging the pressure contacts, as required by claim 16. An argument analogous to the one provided above with respect to dependent claim 5 applies here as well. Hence, for at least this second reason, Applicants respectfully request that the Patent Office withdraw the rejection of dependent claim 16.

II. Claims Rejected Under 35 U.S.C. § 103

The Patent Office rejects claims 3, 4, 6-9 and 20-22 under 35 U.S.C. § 103(a) as being unpatentable over <u>Sinclair</u>.

Applicants respectfully disagree with the rejection above of claims 3, 4 and 6-9 for at least the reasons that those claims depend upon allowable base claim 1. Thus, dependent claims 3, 4 and 6-9 are allowable for at least the reasons explained above. Hence, Applicants respectfully request that the Patent Office withdraw the rejection above of dependent claims 3, 4 and 6-9.

Also, Applicants respectfully disagree with the rejection above and submit that independent claim 20 is allowable for at least the reason that <u>Sinclair</u> does not teach or suggest three dimensional pressure contacts in the formable planar base, wherein the pressure contacts

and the contact surface are directionally deformable, as required by claim 20. To render a claim obvious, all limitations of that claim must be taught or suggested by at least one properly combined reference. An argument analogous to the one provided above with respect to independent claim 1 applies here as well. Specifically, Sinclair teaches assemblies 38 mounted in apertures 32 of base 26. However, the Patent Office has not identified and Applicants are unable to find any teaching or suggestion of three dimensional pressure contacts formed in a formable planar base, wherein the contacts and contact surfaces are directionally deformable, as required by claim 20. Hence, for at least this first reason, Applicants respectfully request the Patent Office withdraw the rejection above of independent claim 20.

Applicants submit that dependent claims 21-22, being dependent upon allowable base claim 20, are allowable for at least the reasons given above. Hence, Applicants respectfully request that the Patent Office withdraw the rejection to dependent claims 21-22.

The Patent Office rejects claims 16-22 under 35 U.S.C. § 103 (a) as being unpatentable over Beaman.

Applicants respectfully disagree with the rejection above of claims 16-19 for at least this reason that these claims depend upon allowable base claim 13. Thus, dependent claims 16-19 are allowable for at least the reasons explained above for independent claim 13. Hence, Applicants respectfully request the Patent Office withdraw rejection above for dependent claims 16-19.

Alos, Applicants respectfully disagree with the rejection above and submit that independent claim 20 is allowable for at least the reason that <u>Beaman</u> does not teach or suggest three dimensional pressure contacts in the formable planar base, wherein the pressure contacts and the contact surface are directionally deformable, as required by claim 20. An argument analogous to the one provided above with respect to independent claim 13 applies here as well. Specifically, <u>Beaman</u> teaches interposer 3 and inter layer 16. However, the Patent Office has not identified and Applicants are unable to find any teaching or suggestion of three dimensional pressure contacts formed in a formable planar base, wherein the contacts and contact surfaces are directionally deformable, as required by claim 20. Hence, for at least this first reason, Applicants respectfully request the Patent Office withdraw the rejection above of independent claim 20.

Applicants submit that dependent claims 21-22, being dependent upon allowable base claim 20, are allowable for at least this reason given above. Hence, the Applicant respectfully request the Patent Office withdraw rejection above for claims 21-22.

Next, for claims 4, 8, 16, and 17, the Patent Office asserts that it is inherent that a pressure should be between 0.4/0.2 Newton and 1.4/0.6 Newton and it would have been obvious to one of ordinary skill in the art, at the time of the invention, for the pressure to be between 0.4/0.2 Newton and 1.4/0.6 Newton in order not to permanently deform the structure and thus the modulus of elasticity greater than the pressure applied. Applicants disagree that it is inherent since pressures outside of the claimed ranges could be applied and since interposers could be fabricated that become permanently deformed when such pressure is applied thereto. Moreover, Applicants respectfully traverse the above statement by the Patent Office and request that the Patent Office cite a reference in support of that position in accordance with MPEP §2144.03.

Furthermore, for claims 3, 6, 7, 9, 18, and 19, the Patent Office asserts it would have been an obvious matter of design choice for <u>Sinclair</u> to have various dimensions as claimed. Applicants respectfully disagree as the various dimensions claimed allow an interposer having pressure contacts formed therein to be directionally deformable under a desired range of contact pressure without becoming permanently deformed or damaged.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date.

Respectfully submitted,

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Dated: Strawar A LM

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Amber D. Saunders

Date